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Pages:	Cover + 1 + 1 + 1 + 23 = 27	Date:	October 16, 2006
From:	Georgann S. Grunebach	Fax:	(310) 964-0941
	Assistant General Counsel	Phone:	(310) 964-4615

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Georgann S. Grunebach, Reg. No. 33,179
(Printed Name of Person Signing Certificate)

October 16, 2006
(Date of Signature)

Telephone No. (310) 964-4615

Attention: Commissioner for Patents **Attorney Docket No. PD-201122**

Please find attached Re:

Serial No.: 10/040,773 Filing Date: 12/28/2001

- ➢ TRANSMITTAL FORM PTO/SB/21 (1 page)
- ➢ FEE TRANSMITTAL FORM PTO/SB/17 (1 page in duplicate)
- ➢ APPEAL BRIEF IN RESPONSE TO NOTICE OF APPEAL DATED SEPTEMBER 28, 2006 (23 pages)

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TRANSMITTAL FORM

(to be used for all correspondence after initial filing)

Application Number	10/040,773
Filing Date	12/28/2001
First Named Inventor	Benn Bollay
Art Unit	2668
Examiner Name	BLOUNT, Steven
Attorney Docket Number	PD-201122
Total Number of Pages in This Submission	26

ENCLOSURES *(Check all that apply)*

☑ Fee Transmittal Form
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☐ Amendment/Reply
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SIGNATURE OF APPLICANT, ATTORNEY, OR AGENT

Firm Name	The DirecTV Group, Inc.		
Signature			
Printed name	Georgann S. Grunebach		
Date	October 16, 2006	Reg. No.	33,179

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FEE TRANSMITTAL
For FY 2006

☐ Applicant claims small entity status. See 37 CFR 1.27

TOTAL AMOUNT OF PAYMENT ($) 500

Complete If Known

Application Number	10/040,773
Filing Date	12/28/2001
First Named Inventor	Benn Bollay
Examiner Name	BLOUNT, Steven
Art Unit	2668
Attorney Docket No.	PD-201122

METHOD OF PAYMENT (check all that apply)

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☑ Deposit Account Deposit Account Number 50-0383 Deposit Account Name: The DIRECTV Group, Inc.

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FEE CALCULATION

1. BASIC FILING, SEARCH, AND EXAMINATION FEES

	FILING FEES		SEARCH FEES		EXAMINATION FEES		
Application Type	Fee ($)	Small Entity Fee ($)	Fee ($)	Small Entity Fee ($)	Fee ($)	Small Entity Fee ($)	Fees Paid ($)
Utility	300	150	500	250	200	100	
Design	200	100	100	50	130	65	
Plant	200	100	300	150	160	80	
Reissue	300	150	500	250	600	300	
Provisional	200	100	0	0	0	0	

2. EXCESS CLAIM FEES

Fee Description	Fee ($)	Small Entity Fee ($)
Each claim over 20 (including Reissues)	50	25
Each independent claim over 3 (including Reissues)	200	100
Multiple dependent claims	360	180

Total Claims ______ - 20 or HP = **Extra Claims** ______ x **Fee ($)** ______ = **Fee Paid ($)** ______
HP = highest number of total claims paid for, if greater than 20.

Indep. Claims ______ - 3 or HP = **Extra Claims** ______ x **Fee ($)** ______ = **Fee Paid ($)** ______
HP = highest number of independent claims paid for, if greater than 3.

Multiple Dependent Claims
Fee ($) ______ **Fee Paid ($)** ______

3. APPLICATION SIZE FEE

If the specification and drawings exceed 100 sheets of paper (excluding electronically filed sequence or computer listings under 37 CFR 1.52(e)), the application size fee due is $250 ($125 for small entity) for each additional 50 sheets or fraction thereof. See 35 U.S.C. 41(a)(1)(G) and 37 CFR 1.16(s).

Total Sheets ______ - 100 = **Extra Sheets** ______ / 50 = **Number of each additional 50 or fraction thereof** ______ (round up to a whole number) x **Fee ($)** ______ = **Fee Paid ($)** ______

4. OTHER FEE(S) **Fees Paid ($)**

Non-English Specification, $130 fee (no small entity discount) ______

Other (e.g., late filing surcharge): Filing of brief in support of an appeal $500

SUBMITTED BY			
Signature		Registration No. (Attorney/Agent) 33,179	Telephone 310-964-4615
Name (Print/Type)	Georgann S. Grunebach		Date October 16, 2006

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Georgann S. Grunebach (Name of Registered Representative)
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Patent
PD-201122

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of:

Benn Bollay

Serial No.	10/040,773	Group Art Unit:	2668
Filed:	12/28/2001	Examiner:	Blount, Steven
For:	CONTENT FILTERING USING STATIC SOURCE ROUTES		

APPEAL BRIEF

Mail Stop Appeal Brief - Patents
Commissioner for Patents
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Sir:

The following Appeal Brief is submitted in response to the Notice of Appeal dated September 28, 2006.

10/17/2006 SSITHIB1 00000084 500383 10040773
01 FC:1402 500.00 DA

I. Real Party in Interest

The real party in interest in this matter is The DirecTV Group, Inc., of El Segundo, California, which is 34 percent owned by Fox Entertainment Group, which is approximately 82 percent owned by The News Corporation, Limited.

II. Related Appeals and Interferences

There are no other known appeals or interferences which will directly affect or be directly affected by or have bearing on the Board's decision in the pending appeal.

III. Status of the Claims

Claims 1-25 stand rejected in the Final Office Action and are appealed herein.

IV. Status of Amendments

There have been no Amendments filed after the final rejection.

V. Summary of Claimed Subject Matter

The present system is generally shown in Figure 2. The filtering routers are shown in Figure 4 and methods for operating the present system are illustrated in Figures 7A and 7B.

Claim 1 is directed to a method for filtering content. A filtering router shown in Figure 4 is used. The method steps are illustrated in Figure 7B and will be described below. Claim 1 recites receiving at a content filtering router a packet containing a request for content, where said packet comprises a first destination internet protocol (IP) address of a content server that stores the content and a second destination IP address of the content filtering router. The corresponding step is Step 734, which is described on Page 13, Lines 1-4.

Claim 1 further recites determining whether the first destination IP address is on a list of destination IP addresses to be filtered. This is illustrated in Figure 7B as Step 736 and is described on Page 14, Lines 10-12.

Claim 1 also recites routing the packet to an output port on the content filtering router based on the first destination IP address and the list. This is illustrated as Step 744 and is described on Page 14, Lines 15-16.

Claim 2 depends from Claim 1 and recites that determining comprises ascertaining that the first IP address is on the list, and wherein said routing comprises directing said packet someplace other than said first destination IP address. This is described on Page 11, Lines 26-28.

Claim 3 depends from Claim 1 and recites that determining comprises ascertaining through which output port the packet should be forwarded based on the first destination IP address and a routing table stored on the content filtering router. The routing table is illustrated as reference numeral 418 in Figure 4 and the router is illustrated in various places, including in Figure 4 as 210, 212 and 214. This step is described on Page 11, Line 20 through Page 12, Line 2.

Claim 4 depends from Claim 3 and recites that ascertaining utilizes a routing protocol 416 to determine the output port. This is described on Page 11, Line 10.

Claim 5 depends from Claim 4 and recites that the routing protocol is a border-gateway protocol. This is described on Page 11, Line 11.

Claim 6 depends from Claim 3 and recites that the routing table 418 is a border-gateway protocol table. This is also described on Page 11, Line 11.

Claim 7 depends from Claim 2 and recites that directing comprises sending the packet to an additional content filtering router, where said packet comprises a third destination IP address of the additional content filtering router. This is described on Page 10, Lines 21-28 and Page 16, Line 9. Various numbers of filtering routers are illustrated in Figure 2. Two filtering routers are also illustrated in the process of Figure 8B as 210 and 212.

Claim 8 depends from Claim 2 and recites that directing comprises sending the packet to a service provider, such that the service provider can notify a user who made the request that the content has been blocked. This is described on Page 15, Lines 12-15.

Claim 9 depends from Claim 1 and recites that before receiving, accepting the first destination IP address and an associated output port on the content filtering router. This is described as Step 706. Claim 9 also recites storing the first destination IP address and the associated output port in the list on the content filtering router. This is described in Step 712. These steps are described on Page 12, Line 14.

Claim 10 depends from Claim 8 and recites that storing comprises saving the first destination IP address and the associated output port in a routing table on the content filtering router. This is described on Page 12, Line 11-13.

Claim 11 depends from Claim 1 and recites that determining comprises ascertaining that the first IP address is not on the list. This is described on Page 16, Lines 1-4.

Claim 12 depends from Claim 11 and recites the further step of removing the second destination IP address from the packet. This is illustrated as Step 742 of Figure 7B and is described on Page 14, Line 12.

Claim 13 depends from Claim 11 and recites that routing comprises directing the packet toward the first destination IP address. This is described on Page 16, Lines 1-4.

Claim 14 is a second independent claim and describes a method for filtering content. Claim 14 recites the step of receiving at an internet protocol (IP) communication device a packet containing a request for content, where said packet comprises a source IP address of a client computer from where the request originated and a first destination IP address of a content server that stores the content. This is illustrated in Figure 7B as Step 734 and described on Page 13, Lines 1-4.

Claim 14 further recites determining that the request is to be subjected to a content filtering service, based on the first destination IP address. This is set forth on Page 15, Lines 10-12 and is illustrated as Step 736 in Figure 7B.

Claim 14 additionally recites adding a second destination IP address of a content filtering router to the packet. This is described on Page 14, Lines 3-6. Claim 14 also recites sending the packet toward the content filtering router. This is described on Page 14, Lines 4-5.

Claim 15 depends from Claim 14 and recites that prior to adding, determining to how many content filtering levels the request is to be subjected. This is described on Page 13, Lines 6-10.

Claim 16 depends from Claim 15 and recites that adding further comprises adding an additional destination IP address to the packet for each of the content filtering levels. This is described on Page 13, Lines 14-17.

Claim 17 depends from Claim 14 and recites the further steps of receiving the content from the content server, when the first destination IP address was not on a routing table on the content filtering router, and sending the content to the source IP address. This is described on Page 6, Lines 1-4.

Claim 18 depends from Claim 14 and recites the further steps of before receiving, acquiring the source IP address and an indicator of whether the content filtering service is to applied to the source IP address, and storing the source IP address and the indicator. This is described on Page 10, Lines 10-18.

Claim 19 depends from Claim 18 and recites that acquiring comprises obtaining a filtering level associated with the source IP address. This is described on Page 10, Lines 15-18.

Claim 20 depends from Claim 14 and recites that before receiving, acquiring a list of filtering levels and associated second destination IP addresses, where each filtering level is associated with a different second destination IP address from a different content filtering router and storing the list of filtering levels and associated second destination IP addresses. This is described on Page 10, Lines 10-18.

Claim 21 is an independent claim directed to a content filtering router. As mentioned above, the content filtering router is generally illustrated in Figure 4. Claim 21 recites a central processing unit (CPU) 402, communications circuitry 404, input ports 406 (1) - 430 (N), a memory 410 containing an operating system 412, and communication procedures 414. The communication procedures are configured to receive a packet containing a request for content, where said packet comprises a first destination internet protocol (IP) address of a content server that stores the content and a second destination IP address of the content filtering router. Claim 21 also recites a routing protocol 416. The above components are all described on Page 10, Line 30 through Page 11, Line 6.

The routing protocol 416 includes instructions for determining whether the first destination IP address is on a list of destination IP addresses to be filtered. This is described on Page 14, Lines 10-12.

Claim 21 further recites that the routing protocol includes instructions for routing the packet to one of the output ports based on the first destination IP address and the list. This is described on Page 14, Lines 15-16. Claim 21 also recites that the routing protocol includes a routing table 418 containing the list. The routing table is described on Page 11, Line 11.

Claim 22 is an independent claim directed to a bidirectional internet protocol (IP) communication device. The device is set forth as reference numeral 204 in Figure 3. The bidirectional IP communication device includes a central processing unit (CPU) 302, communications circuitry 304, input and output ports 306 (1) - 306 (N), and memory 310 that includes a operating system 312 and communications procedures 314. These elements are described on Page 9, Lines 17-32.

The communication procedures include instructions for receiving a packet containing a request for content where the packet comprises a source IP address of a client computer from where the request originated and a first destination IP address of the content server that stores the content, and instructions for sending the packet toward a content filtering router. This is described on Page 13, Lines 1-4 and Page 14, Lines 4-5.

Claim 22 also recites filtering procedures 316, illustrated in Figure 3, that include instructions for determining that the request is to be subjected to a content filtering service, based on the first destination IP address. This is described on Page 14, Lines 10-12.

Claim 22 further recites instructions for adding a second destination IP address of the content filtering router to the packet before it is send toward the content filtering router. This is described on Page 14, Lines 3-6.

Claim 23 is an independent claim directed to a computer program product for use in conjunction with a computer system for content filtering. The computer program product includes a computer readable storage and computer readable program to store therein. The program comprises of instructions for receiving at an internet protocol (IP) communication device a packet containing a request for content where the packet comprises a source IP address of a client computer from where the request originated and a final destination IP address of a content server that stores the content. This is described on Page 13, Lines 1-4. The computer program product further includes instructions for determining that the request is to be subjected to a content filtering service, based on the first destination IP address. This is described on Page 14, Lines 10-12.

Claim 23 further recites instructions for adding a second destination IP address of a content filtering router to the packet before it is sent toward the content filtering router. This is described on Page 14, Lines 3-6.

Claim 24 is an independent claim that is directed to a system for content filtering comprising an internet protocol (IP) communication device 204 coupled between at least one client computer 202 and at least one filtering router 210. The client computer and the filtering router are illustrated in Figure 2 and described on page 18, lines 18-25. Claim 24 further recites that the IP communication device 204 is configured to route requests for content received from the at least one client computer toward at least one filtering router, and where the at least one filtering router is configured to route the request for contents someplace other than a content server that stores the content when the content server's IP address is on a list of addresses to be filtered, wherein the list is a routing table stored on the content filtering router. These steps are described on Page 14, Lines 10-12 and Page 16, Lines 1-4.

Claim 25 depends from Claim 24 and recites that the at least one filtering router is configured to route the request for content to the content server when the content server's IP address is not on the list of addresses to be filtered. This is described on Page 16, Lines 1-4.

VI. Grounds of Rejection to be reviewed on Appeal

The following issues are presented in this appeal:

Whether claims 1-20 and 23-25 are unpatentable under 35 U.S.C. §103(a) as being unpatentable over *Haviv* (2002/0059451) in view of Appellant's Admitted Prior Art (*AAPA*).

Whether claims 21-22 are unpatentable under 35 U.S.C. §103(a) over *Haviv* in view of *AAPA* in further view of *Hatanaka* (6,560,233). .

VII. Argument

The Rejection of Claims 1-20 and 23-25 under 35 U.S.C. §103(a)

Claim 1

Claim 1 is a method for filtering content that includes receiving a packet containing a request for content at a content filtering router. The packet has a first destination Internet Protocol address of a content server that stores the content and the second destination IP address of the content filtering router. The method further includes determining whether the first destination IP address is on a list of destination IP addresses to be filtered and routing the packet to an output on the content filtering router based on the first destination IP address and the list.

The Examiner points to paragraph 21 of the *Haviv* reference that describes a router and a filter. As described in line 6 of paragraph 21, the router may filter transactions and may route the filtered transactions to one of the server computers 14 or to another router 16 for additional filtering. With regard to this section, the Examiner states that "Haviv teaches content filter router 16 which receives packets which would include the address of the said router just before it receives the packet, and filters the packet before sending it to content servers 14." The *Haviv* reference is set forth for all the elements of Claim 1 except for presenting information on the list which the Examiner states is in the *AAPA*.

The Appellant disagrees with the Examiner on many levels. First, the Examiner fails to specifically state that the first element of Claim 1 is recited in the *Haviv* reference. Claim 1 specifically recites a packet containing a request for content is received at a content filtering router. No such request for content is set forth in paragraph 21 of the *Haviv* reference.

The second step of the claim is determining whether the destination IP address is on a list of destination IP addresses to be filtered. The Examiner cites the *AAPA* for this. However, although a list of restricted sites is mentioned in the *AAPA*, there is not determination of whether the destination IP address is on a list of destination IP addresses to be filtered. Further, neither of the references recite routing the packet to an output port on the content filtering router based on the first destination IP address and the list. Appellant, therefore, respectfully requests the Board to reverse the Examiner's rejection of Claim 1.

Claim 2

For Claim 2, the Examiner points to the routing to servers 14. However, no teaching or suggestion is provided on the *Haviv* reference that the step of determining comprises ascertaining that the first IP address is on the list and wherein the routing comprises directing the packet someplace other than the first destination IP address.

Claim 3

For Claim 3, the Examiner points to Paragraph 56 of the *Haviv* reference Paragraph 56 merely describes a firewall 60 that is adapted to control which network resources or ports may be accessed by the gateway. However, Appellant can find no teaching or suggestion for ascertaining through which port the packet will be forwarded based upon the first destination IP address and a routing table on the content filtering router.

Claim 4

Claim 4 depends from Claim 3 and recites routing protocol that determine the output port. For the same reason set forth above with respect to Claim 3, Claim 4 is also believed to be allowable.

Claim 5

Claim 5 depends from Claim 4 and recites that the routing protocol is a border-gateway protocol. As mentioned above, no routing table is set forth in Claim 3 and, therefore, Claim 5 is also believed to be allowable for the same reason set forth above.

Claim 6

Claim 6 depends from Claim 3 and recites the routing tables of a border-gateway protocol table. As mentioned above with respect to Claim 3, no routing table is set forth with respect to the firewall. Therefore, Appellant respectfully requests the Board to reverse the Examiner's position with respect to this claim as well.

Claim 7

Claim 7 recites that directing the packet someplace other than the first destination IP address comprises sending the packet to an additional content filter router wherein the packet comprises a third destination IP address of the additional content filter router. The Examiner points to Paragraph 21 of the *Haviv* reference for this teaching. Although several cascaded routers are described, routing them someplace other than the first destination IP address is not taught or suggested in this paragraph. Therefore, Appellant respectfully requests the Board to reverse the Examiner's position with respect to Claim 7 as well.

Claim 8

Claim 8 recites that directing comprises sending the packet to a service provider, such that the service provider can notify the user who made the request that the content has been blocked. The Examiner states that members 14 were would obvious to connect to a service provider. However, Appellant respectfully submit that this is not taught or suggested on the *Haviv* reference. Therefore, Appellant respectfully requests the Board to reverse the Examiner's position with respect to Claim 8 as well.

Claim 9

Claim 9 recites that before the step of receiving accepting the first destination IP address and an associated output port on the content filtering router, and storing the first destination IP address and the associated output port in the list on the content filtering router. The Examiner merely points to the discussions of ports and the list above. As mentioned above, the Appellant respectfully submits that no teaching or suggestion provide for the list on the content filtering router. Appellant, therefore, respectfully requests the Board to reverse the Examiner's position with respect to Claim 9.

Claim 10

Claim 10 recites saving the first destination IP address and the associated output port and the routing table on the content router. As mentioned above, no teaching or suggestion is provided for a routing table in the *Haviv* reference. Therefore, Appellant respectfully requests that the Board reverse the Examiner's position with respect to Claim 10.

Claim 11

Claim 11 depends from Claim 1 and recites that ascertaining the first destination IP address is not on the list. The Examiner points to the checking of the list discussion. However, Appellant can find no teaching or suggestion for ascertaining that the IP address is not on the list. Therefore, Appellant respectfully requests the Board to reverse the Examiner's position with respect to Claim 11.

Claim 12

Claim 12 recites removing the second destination IP address from the packet. The Examiner merely states "the second destination would obviously be removed." Appellant respectfully requests the Board to reverse the Examiner's position, since this step is not taught or suggested in the *Haviv* reference.

Claim 13

Claim 13 recites directing the packet towards the first destination IP address. These limitations in combination with Claim 11 and Claim 1 are not taught or suggested in the references. Therefore, Appellant respectfully requests the Board to reverse the Examiner's position with respect to Claim 13.

Claims 14 and 23

Independent Claim 14 recites receiving at an Internet Protocol communications device a packet containing a request for content where the packet comprises a source IP address of a client computer from where the request originated and a first destination IP address of a content server that stores the content. The method further includes determining that the request is to be subjected to a content filtering service based on the destination IP address and adding a second destination IP address of a content filtering router to the packet and sending the packet toward the content filtering router. Appellant respectfully submits that there is no teaching or suggestion in paragraph 21 of *Haviv* or in the *AAPA* for adding a second destination IP address of a content filtering router to a packet. *Haviv* merely teaches that routers may filter transactions but not of adding a second IP address to the packet. Appellant, therefore, respectfully requests the Board to reverse the Examiner's rejection of Claim 14.

Claim 23 is another independent claim that is directed to a computer program. The claim is very similar to that of Claim 14 and, therefore, Appellant respectfully requests the Board to reverse the Examiner's rejection of Claim 14 as well.

Claim 15

Claim 15 depends from Claim 14 and recites prior to adding, determining to how many content filtering levels said request is to be subjected. The Examiner merely states that multiple routers above make the step obvious. However, Appellant can find no teaching or suggestion for determining to how many content filtering levels the request is subjected. Appellant, therefore, respectfully requests the Board to reverse the Examiner's position with respect to Claim 15.

Claim 16

Claim 16 depends from Claim 15 and recites adding an additional destination IP address to the packet for each of the content filtering levels. Again, there is no teaching or suggestion for adding destination IP addresses to the packet. Appellant, therefore, respectfully requests the Board to reverse the Examiner's position with respect to Claim 16 as well.

Claim 17

Claim 17 recites receiving the content from the content server when the first destination IP address was not on a routing table on the content filtering router, and sending the content to the source IP address. The Examiner merely points to the use of the server 14 for this step. However, there is no teaching or suggestion in the *Haviv* reference for these steps. Appellant, therefore, respectfully requests the Board to reverse the Examiner's position with respect to Claim 17.

Claim 18

Claim 18 recites the further steps of before receiving, acquiring the source IP address and an indicator of whether the content filtering service is to be applied to the source IP address and storing the source IP address and the indicator. The Examiner points out that the use of an on-off type indicator would be obvious. However, there is no teaching or suggestion in the *Haviv* reference for this. Appellant, therefore, respectfully requests the Board to reverse the Examiner's position with respect to Claim 18.

Claim 19

Claim 19 depends from Claim 18 and recites obtaining a filtering level associated with the source IP address. The Examiner merely states that the use of a level for the source address would be obvious in order that the proper filter may be applied. Appellants can find no teaching or suggestion of this in the *Haviv* reference. Therefore, Appellant respectfully requests the Board to reverse the Examiner's position with respect to Claim 19 as well.

Claim 20

Claim 20 recites the steps of acquiring a list of filtering level and associated second destination IP addresses where each filtering level is associated with a different second destination IP address of a different content filtering router, and storing the list of filtering levels and associated second destination IP addresses. The Examiner merely points to the discussion of the use of a list and multiple levels. However, there is no specific passage teaching or suggestion for these steps. Appellant, therefore, respectfully requests the Board to reverse the Examiner's position with respect to Claim 20.

Claim 24

Independent Claim 24 is directed to a system for content filtering comprising an Internet Protocol communications device coupled between at least one client computer and at least one filtering router. The IP communications device is configured to route requests for content received from the at least one client computer toward the at least one filtering router and where the at least one filtering router is configured to route the request for content someplace other than a content server that stores the content when the content server's IP address is upon a list of addresses to be filtered. The list is a routing table stored on the content filtering router. As mentioned above, the *AAPA* mentions a list. However, the list is not a routing table stored on the content filtering router and neither of the references mentions that a filtering router is configured to route the request for content someplace other than a content server that stores the content when the content server's IP address is on a list of addresses to be filtered. Appellant, therefore, respectfully requests the Board to reverse the Examiner's rejection of Claim 14.

Claim 25

Claim 25 depends from Claim 24 and recites that at least one filtering router is further configured to route the request for the content server when the content server's IP address is not on the list of addresses to be filtered. The Examiner merely refers to the discussion of Claim 1 above. Appellants can find no teaching or suggestion for this step in the *Haviv* reference. Therefore, Appellant respectfully requests the Board to reverse the Examiner's position with respect to Claim 25 as well.

The rejection of Claims 21-22 under 35 U.S.C. §103(a) over *Haviv* in view of *AAPA* in further view of *Hatanaka* (6,560,233)

Claim 21 is directed to a content filtering router. Claim 21 is similar to Claim 1 in that Claim 21 includes instructions for determining whether the first destination IP address is on a list of destination IP addresses to be filtered and instructions for routing the packet to one of the output ports based on the first IP destination address and the list. In this case, the routing table contains the list. As mentioned above with respect to Claim 1, these steps are not found in the either the *Haviv* or *AAPA*. The *Hatanaka* reference also does not teach or suggest the elements missing from above. The *Hatanaka* reference is merely cited to teach a router and not the elements missing from the *Haviv* and the *AAPA*. Appellant, therefore, respectfully requests the Board to reverse the Examiner's rejection of Claim 1 as well.

Claim 22 is directed to a bi-directional Internet Protocol communications device that has similar limitations to those of Claim 14 in that their instructions are for performing most of the steps of Claim 14. As mentioned above with respect to Claim 14, the *Haviv* and the *AAPA* do not teach or suggest these elements. The *Hatanaka* reference is merely set forth for the basic teachings of input/output ports, a central processing unit, and communications circuitry. It is not alleged that the *Hatanaka* reference teaches or suggests the elements missing from the *Haviv* and *AAPA*. Appellant, therefore, respectfully requests the Board to reverse the Examiner's rejection of Claim 22 as well.

Conclusion

For the foregoing reasons, Appellant respectfully requests that the Board direct the Examiner in charge of this examination to withdraw the rejections.

Should any fees be associated with this submission, please charge Deposit Account 50-0383.

Respectfully submitted,

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VIII. CLAIMS APPENDIX

1. A method for filtering content, comprising:

receiving at a content filtering router a packet containing a request for content, where said packet comprises a first destination Internet Protocol (IP) address of a content server that stores said content and a second destination IP address of said content filtering router;

determining whether said first destination IP address is on a list of destination IP addresses to be filtered; and

routing said packet to an output port on said content filtering router based on said first destination IP address and said list.

2. The method of claim 1, wherein said determining comprises ascertaining that said first IP address is on said list, and wherein said routing comprises directing said packet someplace other than said first destination IP address.

3. The method of claim 1, wherein said determining step comprises ascertaining through which output port said packet should be forwarded based on said first destination IP address and a routing table stored on said content filtering router.

4. The method of claim 3, wherein said ascertaining utilizes a routing protocol to determine said output port.

5. The method of claim 4, wherein said routing protocol is a Border Gateway Protocol (BGP).

6. The method of claim 3, wherein said routing table is a Border Gateway Protocol (BGP) table.

7. The method of claim 2, wherein said directing comprises sending said packet to an additional content filtering router, where said packet comprises a third destination IP address of said additional content filtering router.

8. The method of claim 2, wherein said directing comprises sending said packet to a service provider, such that said service provider can notify a user who made said request that said content has been blocked.

9. The method of claim 1, further comprising, before said receiving,

accepting said first destination IP address and an associated output port on said content filtering router; and

storing said first destination IP address and said associated output port in said list on said content filtering router.

10. The method of claim 8, wherein said storing comprises saving said first destination IP address and said associated output port in a routing table on said content filtering router.

11. The method of claim 1, wherein said determining comprises ascertaining that said first IP address is not on said list.

12. The method of claim 11, further comprising removing said second destination IP address from said packet.

13. The method of claim 11, wherein said routing comprises directing said packet toward said first destination IP address.

14. A method for filtering content, comprising:

receiving at an Internet Protocol (IP) communications device a packet containing a request for content where said packet comprises a source IP address of a client computer from where the request originated and a first destination IP address of a content server that stores said content;

determining that said request is to be subjected to a content filtering service, based on said destination IP address;

adding a second destination IP address of a content filtering router to said packet; and

sending said packet toward said content filtering router.

15. The method of claim 14, further comprising, prior to said adding, determining how many content filtering levels said request is to be subjected to.

16. The method of claim 15, wherein said adding further comprises adding an additional destination IP address to said packet for each of said content filtering levels.

17. The method of claim 14, further comprising:

receiving said content from said content server, when said first destination IP address was not on a routing table on said content filtering router; and

sending said content to said source IP address.

18. The method of claim 14, further comprising, before said receiving,

acquiring said source IP address and an indicator of whether said content filtering service is to be applied to said source IP address;

storing said source IP address and said indicator.

19. The method of claim 18, wherein said acquiring further comprises obtaining a filtering level associated with said source IP address.

20. The method of claim 14, further comprising, before said receiving,

acquiring a list of filtering levels and associated second destination IP addresses, where each filtering level is associated with a different second destination IP address of a different content filtering router;

storing said list of filtering levels and associated second destination IP addresses.

21. A content filtering router, comprising:

a Central Processing Unit (CPU);

communications circuitry;

input ports;

output ports; and

a memory containing:

an operating system;

communication procedures configured to receive a packet containing a request for content, where said packet comprises a first destination Internet Protocol (IP) address of a content server that stores said content and a second destination IP address of said content filtering router;

a routing protocol comprising:

instructions for determining whether said first destination IP address is on a list of destination IP addresses to be filtered;

instructions for routing said packet to one of said output ports based on said first destination IP address and said list; and

a routing table containing said list.

22. A bidirectional Internet Protocol (IP) communications device, comprising:

a Central Processing Unit (CPU);

communications circuitry; and

input/output ports; and a memory containing:

an operating system;

communication procedures comprising:

instructions for receiving a packet containing a request for content where said packet comprises an source IP address of a client computer from where the request originated and a first destination IP address of a content server that stores said content; and

instructions for sending said packet toward a content filtering router;

filtering procedures comprising:

instructions for determining that said request is to be subjected to a content filtering service, based on said destination IP address; and

instructions for adding a second destination IP address of said content filtering router to said packet before it is sent toward said content filtering router.

23. A computer program product for use in conjunction with a computer system for content filtering, the computer program product comprising a computer readable storage and a computer program stored therein, the computer program comprising:

instructions for receiving at an Internet Protocol (IP) communications device a packet containing a request for content where said packet comprises an source IP address of a client computer from where the request originated and a first destination IP address of a content server that stores said content;

instructions for determining that said request is to be subjected to a content filtering service, based on said destination IP address;

instructions for adding a second destination IP address of a content filtering router to said packet; and

instructions for sending said packet toward said content filtering router.

24. A system for content filtering, comprising an Internet Protocol (IP) communications device coupled between at least one client computer and at least one filtering router, where said IP communications device is configured to route requests for content received from said at least one client computer toward said at least one filtering router, and where said at least one filtering router is configured to route said requests for content someplace other than a content server that stores said content when said content server's IP address is on a list of addresses to be filtered, where said list is a routing table stored on said content filtering router.

25. The system of claim 24, wherein said at least one filtering router is further configured to route said requests for content to said content server when said content server's IP address is not on said list of addresses to be filtered.

IX. Evidence Appendix

None.

X. Related Proceedings Appendix

None.